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**To:** [Breau, Brian W MVN](#)  
**Cc:** [Kitto, Alison](#); [Kyle Balkum \(kbalkum@wlf.la.gov\)](#); [David Soileau](#); [Elizabeth Johnson \(DEO\)](#); [Crawford, Dorothy](#)  
**Subject:** MVN-2014-1575; Lake Charles LNG  
**Date:** Monday, June 15, 2015 5:24:00 PM

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Brian,

The Environmental Protection Agency (EPA) has reviewed the Public Notice dated May 11, 2015, concerning Department of the Army Permit Application Number MVN-2014-1575, submitted by Lake Charles LNG Company, LLC, Lake Charles LNG Export Company, LLC, and Trunkline Gas Company, LLC. The applicant is proposing to construct new natural gas liquefaction and pipeline facilities and modify the existing Lake Charles LNG Import Terminal to export LNG. The liquefaction facilities will be located adjacent to the Lake Charles LNG Import Terminal in Calcasieu Parish. Pipeline facilities and components will be located in Calcasieu, Jefferson Davis, Acadia, Cameron, Allen, and Beauregard parishes. The proposed project will impact a total of 273.48 acres of jurisdictional wetlands. The comments that follow are being provided for use in reaching a decision relative to compliance with the EPA's *404(b)(1) Guidelines for Specification of Disposal Sites for Dredged or Fill Material (40 CFR Part 230)*.

The jurisdictional wetlands that would be impacted by this project not only provide wildlife habitat, but also perform valuable water quality maintenance functions by removing excess nutrients and pollutants from the water. They also provide floodwater storage. As you are aware, wetland areas such as those proposed to be impacted have experienced a tremendous decline in Louisiana. The *404(b)(1) Guidelines* prohibit the discharge of dredged or fill material into waters of the United States, including wetlands, if there is a practicable alternative.

The EPA is concerned with the potential direct, indirect, and cumulative impacts of the proposed project. Construction of the proposed project will result in the loss of wetland habitat and will likely impact other important wetland functions including floodwater abatement and water quality improvement. These functional losses, when combined with increased impervious surfaces resulting from the project, may lead to adverse downstream impacts such as decreased water quality and increased flooding. Moreover, the proposed project would add to cumulative development-related wetlands losses in Calcasieu Parish.

The EPA does not object to the project as proposed provided that the applicant has satisfied the requirements of the *404(b)(1) Guidelines*. This should include providing compensatory mitigation within the project watershed for all unavoidable impacts that should fully offset all lost functions and values. The applicant should examine mitigation opportunities that include coastal prairie and longleaf pine savanna options. The EPA is interested in reviewing the compensatory mitigation plan when it is available. Thank you for the opportunity to review and comment on the public notice. If you have any questions or would like to discuss the issues further, please feel free to contact me.

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